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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

LYNWOOD INVESTMENTS CY LIMITED,

Plaintiff,

vs.

MAXIM KONOVALOV, *et al.*,

Defendants.

Case No. 3:20-CV-03778-LHK

**DECLARATION OF ALEXANDER D.  
PENCU IN SUPPORT OF PLAINTIFF'S  
SUPPLEMENTAL OPPOSITION TO  
DEFENDANTS MAXIM KONOVALOV,  
IGOR SYSOEV, ANDREY ALEXEEV,  
MAXIM DOUNIN, GLEB SMIRNOFF,  
AND ANGUS ROBERTSON'S MOTION  
FOR ATTORNEYS' FEES (ECF 174)**

The Honorable Maxine M. Chesney

1 I, Alexander D. Pencu, declare under penalty of perjury as follows:

2 1. I am a partner of Meister Seelig & Fein PLLC, one of the attorneys for Plaintiff,  
3 Hemma Investments CY Limited f/k/a Lynwood Investments CY Limited (“Lynwood”), and I am  
4 admitted *Pro Hac Vice* in the above-captioned action. I am duly authorized and licensed to practice  
5 law before all courts in the State of New York and the State of Connecticut, the Southern and Eastern  
6 District Courts of New York, and the District of Connecticut. I submit this declaration in support of  
7 Lynwood’s supplemental opposition to Defendants Maxim Konovalov, Igor Sysoev, Andrey  
8 Alexeev, Maxim Dounin, Gleb Smirnov, and Angus Robertson’s (together the “Individual  
9 Defendants”) Motion for Attorneys’ Fees (ECF 174) (the “Motion”).

10 2. On December 20, 2022, the Court ordered Individual Defendants to submit  
11 contemporaneous time records, finding that “absent submission of contemporaneous time records,  
12 the Court is unable to determine the appropriate amount of attorneys’ fees to be awarded.” (ECF  
13 184, pp. 14-15).

14 3. On January 17, 2023, Individual Defendants submitted their supplemental submission  
15 regarding amount of attorneys’ fees (ECF 185) and Declaration of Bruce W. Baber (ECF 185-1)  
16 attaching Exhibits A to T, which Individual Defendants submit are chronological invoices that  
17 include all fees requested by Individual Defendants.

18 4. Upon receipt, Lynwood reviewed Individual Defendants’ time records to respond to  
19 Individual Defendants’ supplemental submission. Lynwood opposes Individual Defendants’ fee  
20 motion in its entirety. In further support of its opposition Lynwood identified several categories of  
21 fees identified on Individual Defendants’ time records that Lynwood contends are improper and  
22 should be excluded from any fee award. For the Court’s convenience, Lynwood submits the  
23 following exhibits which contain relevant excerpts from Individual Defendants’ chronological  
24 invoices.

25 5. Attached hereto as **Exhibit A** is an excerpted collection from Individual Defendants’  
26 time records containing all time entries entered by King & Spalding attorney Bruce W. Baber.

